

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE STATE OF MISSOURI; MICHAEL
L. PARSON, Governor of the State of Missouri,
in his official capacity; and ERIC SCHMITT,
Attorney General of the State of Missouri, in
his official capacity,

Defendants.

Case No. 2:22-cv-4022

July 13, 2022

FIFTEENTH AMICUS CURIAE BRIEF OF PRIVATE CITIZEN DON HAMRICK

United States v. Matthew Raymond Hoover,

M.D.Fla. (Jacksonville Div.) No: 3:21-cr22(S2)-MMH-MCR

SUPPLEMENT TO MOTION TO DISMISS &

TO DECLARE UNCONSTITUTIONAL THE NATIONAL FIREARMS ACT OF 1934

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WHEREFORE Defendant Matthew Raymond Hoover respectfully **moves this Honorable Court to dismiss the Indictment (ECF 57) against him in its entirety with prejudice, to declare the National Firearms Act facially unconstitutional**, or, in the alternative, unconstitutional as applied to Defendant, and for any further relief that this Court deems just and proper.

DATED: July 1, 2022

Citing S. S. Peloubet, ***A COLLECTION OF LEGAL MAXIMS IN LAW AND EQUITY, WITH ENGLISH TRANSLATIONS***, New York: George S. Diossy, **1880**

“regarding intergovernmental immunity”

Impunitas semper ad deteriora invitat.

Impunity invites to greater crimes. p. 102.

**Applies to the human race as a predatory species
with the rest of the animal kingdom, especially the BATFE.**

**The ATF commandeering powers not authorized by Congress.
That, by definition, is Treason. Abolish ATF**

Extra territorium jus dioenti non paretur impune.

The command of one speaking beyond his territory
cannot be obeyed with impunity. pp. 78-79.

Asset forfeiture law is interstate highway robbery by land and by air.

Spes Impunitatis continuum affectum tribuit delinquendi.

The hope of impunity holds out a continual
temptation to crime. p. 284

CUSTOMS (HISTORY AND TRADITION)

ARMED FOR SELF-DEFENSE NATIONWIDE

***In consuetudinibus non diuturnitas temporis
sed soliditas rationis est consideranda.***

In customs, not the length of time but the
strength of the reasons should be considered.

Leges figendi et refigendi consuetudo est periculosissima.

The custom of making and unmaking laws is most dangerous. p. 144.

Maleficia propositis distinguuntur.

Evil deeds are distinguished from evil purposes. p. 161.

Malitia est acida, est mali animi affectus.

Malice is sour; it is the quality of a bad mind. p. 161.

Malum quo communius eo pejus.

The more common an evil is the worse. p. 161.

Malus usus est abolendus.

An evil custom is to be abolished. p. 161.

Modus debet esse certus, rationabilis, et perantiquus.

A custom should be certain, reasonable, and very ancient. p. 169.

Modus et conventio vincunt legem.

Custom and agreement overrule law. p. 169.

Mos pro lege.

Custom stands for law. p. 170.

Mos retinendus est fidelilissimæ vetustatis.

A custom of the truest antiquity is to be retained. p. 170.

Obtemperandum est conasuetudini rationabili tanquam legi.

A reasonable custom is to be obeyed as law. p. 207-208.

Optima est legum interpretres consuetudo.

Custom is the best interpreter of laws. p. 214.

Optima est lex quæ minimum relinquit arbitrio iudicis.

That law is the best which leaves least to
the discretion of the judge. p. 214.

***Quæ præter consuetudinem et morem majorum fiunt,
neque plaocent, neque recta videntur.***

Things which are done contrary to the custom and usage of our
ancestors, neither please nor appear right. p. 236.

Ratio est formalls causa consuetudinis.

Reason is the formal cause of custom. p. 260.
